

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:20 MJ 1127 JMB
	)	
NICHOLAS MATTHEW RAY,	)	
	)	
Defendant.	)	
	)	

**MOTION FOR PRE-TRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Kyle T. Bateman, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with:
  - (a) an offense for which a mandatory term of imprisonment of ten years is prescribed, as set forth in Title 18, United States Code, Section 2422 (b);
  - (b) an offense for which a mandatory term of imprisonment of 15 years is prescribed, as set forth in Title 18, United States Code, Section 2252A(a)(2)(A) (distribution of child pornography).

2. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

3. The defendant is a threat to the community. Between on or about March 23, 2020, and on or about June 10, 2020, defendant knowingly distributed and viewed images and videos of child pornography.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

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UNITED STATES ATTORNEY

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